

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA, vs. MICHAEL WAYNE GOURNEAU,	Plaintiff, Defendant.
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Cr. No. 3:22-cr-151 & 3:22-cr-184

**DEFENDANT'S MOTION TO
CONTINUE CHANGE OF PLEA &
SENTENCING HEARING**

Michael Gourneau's plea and sentencing hearing is scheduled for August 12, 2024. Counsel asks the Court to continue his hearing for the following reasons:

Mr. Gourneau is still participating in residential programming at the New Life Center's Genesis Program in Fargo. Mr. Gourneau has been engaged in the program, and he has complied with all of his release conditions. He requests more time to complete the program before sentencing. Additionally, Mr. Gourneau, through counsel, needs more time to gather sentencing mitigation information and documents such as character and support letters and updates on his progress at Genesis.

Defense counsel has discussed this motion with Assistant United States Attorney Alexander Stock. Mr. Stock indicated he does not object to this motion.

Based on the foregoing, Mr. Gourneau moves the Court for an Order continuing the August 12, 2024, hearing to the next available hearing date in January 2025.

Dated this 2nd day of August, 2024.

Respectfully submitted,

JASON J. TUPMAN
Federal Public Defender
By:

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